

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION**

WHY DRIVE 55, INC.,

)

Civil Action

Plaintiff,

No:11-cv-297

v.

)

BONNIE DUNCAN, JOSEPH W. DUNCAN,)
STEVEN J. ALLEN, DOVE AIR, INC., CONAIR)
JET SALES, INC., EDD CONN, ROBERT)
HETTINGER, BILL JOHNSON, ALYSSA)
DUNCAN, JOHN DOE AND JANE DOE, Jointly)
and Severally,

)

)

)

)

Defendants.

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)

**MOTION FOR ENTRY
OF DEFAULT AS TO
DEFENDANT EDD
CONN**

Plaintiff requests the Clerk pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for entry of default by defendant, Edd Conn in the above-captioned matter. Plaintiff submits the attached Declaration of Sean D. Soboleski in support of this motion and proposed order.

Respectfully submitted, this 11th day of March, 2013.

s/ Sean D. Soboleski,
Bar Number: 27620
Attorney for Plaintiff, Why Drive 55, Inc.
Soboleski Law, PC
900 Hendersonville Road, Suite 302
Asheville, NC 28803
Telephone: (828) 285-8888
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CERTIFICATE OF SERVICE

The undersigned certifies to the Court that Plaintiff's Motion for Entry of Default, Declaration of Sean D. Soboleski and Proposed Order for Clerk's Entry of Default, were this day filed electronically with the Clerk of Court using the CM/ECF system.

The undersigned further certifies to the court that the same document identified above was this day served upon the parties to this action electronically through the ECF system pursuant to Rule 5 of the Federal Rules of Civil Procedure, for counsel who are registered through the ECF system. Edd Conn will be served by regular mail at the address below, pursuant to Fed. R. Civ. P. 5.

Nick Rocknich, III: nick@nrpropertylaw.com,
Attorney for Bonnie Duncan, Joseph Duncan, Alyssa Duncan, Robert Hettinger, and
Dove Air, Inc.

Edd Conn, 614 SE 12 Avenue, Deerfield Beach, FL 33441

This the 11th day of March, 2013.

s/ Sean D. Soboleski,
Bar Number: 27620
Attorney for Plaintiff, Why Drive 55, Inc.
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